

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA

In re:	)	Case No. 09-42348
	)	
ALTRA NEBRASKA, LLC,	)	Chapter 11
	)	
Debtor.	)	
	)	
	)	
	)	

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**MOTION FOR ORDER GRANTING SHORTENED NOTICE AND EXPEDITED HEARING REGARDING MOTION UNDER SECTIONS 105(a), 363 AND 365 OF THE BANKRUPTCY CODE TO APPROVE THE ADVERTISEMENT, MARKETING AND SALE OF ALL THE DEBTOR'S ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS AND INTERESTS; AND SETTING A DATE FOR A SALE HEARING**

COMES NOW Altra Nebraska, LLC, debtor and debtor-in-possession (the "Debtor"), and pursuant to Local Rule 9006-1, respectfully moves this Court to shorten the notice period to ten (10) calendar days and to set an expedited hearing date regarding the Debtor's Motion Under Sections 105(a), 363 and 365 of the Bankruptcy Code to Approve the Advertisement, Marketing and Sale of all the Debtor's Assets Free and Clear of all Liens, Claims and Interests; and Setting a Date for a Sale Hearing (the "Sale Motion"). In support of this motion, the Debtor shows the Court as follows:

1. On August 13, 2009 (the "Petition Date"), the Debtor filed with this Court a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor continues to operate its business and manage its property as debtor-in-possession in accordance with Sections 1107 and 1108 of the Bankruptcy Code.
2. No trustee or examiner has been appointed.
3. The Debtor is filing contemporaneously with this motion the Sale Motion, in which the Debtor requests that the Court approve the advertisement, marketing, and sale by

auction or other sale of all the Debtor's assets free and clear of all liens, claims and encumbrances pursuant to 11 U.S.C. § 363.

4. As set forth in the Sale Motion a prompt sale prior to onset of winter, and preferably in October is necessary to preserve the value of the Debtor's assets. The Debtor therefore wishes to shorten the notice period and have an expedited hearing on the Sale Motion in order to maximize the value of its assets at sale.

5. The Debtor therefore requests that the Court set a shortened notice period of ten (10) calendar days and an expedited hearing, to assist the Debtor in preserving the value of its assets pending sale.

WHEREFORE the Debtor requests that this Court grant a shortened notice period of ten (10) calendar days, set an expedited hearing date, and grant such other and further relief as this Court may deem just and proper.

DATED this 13<sup>th</sup> day of August, 2009.

Respectfully submitted,

**ALTRA NEBRASKA, LLC,**  
Debtor

By: /s/ Robert J. Bothe  
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**ATTORNEYS FOR DEBTOR**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2009, I caused filing of the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, and further certify that on the same date I mailed by United States mail, first-class postage prepaid, this document to each of the individuals listed below:

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